

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FINAL FEE APPLICATION COVER SHEET**

Debtor:	LTL Management LLC	Applicant:	EconONE Research, Inc. Randi S. Ellis, Legal Representative for
Case No.:	23-12825-MBK	Client:	Future Talc Claimants
Chapter:	11	Case Filed:	April 4, 2023 (the " <u>Petition Date</u> ")

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**SECTION I  
FEE SUMMARY**

☐ Combined Monthly Fee Application ☒ Final Fee Application

Summary of Amounts Requested for the Final Fee Period from June 1, 2023 through July 31, 2023 (the "Final Fee Period").

	<u>FEES</u>	<u>EXPENSES</u>
Total Previous Fee Requested (June 1, 2023 – July 31, 2023):	\$38,246.40	\$0
Total Fees Allowed to Date:	\$0.00	\$0
Total Retainer (If Applicable):	N/A	N/A
Total Holdback (If Applicable) (June 1, 2023 – July 31, 2023):	\$9,561.60	\$0
Total Received to Date:	\$3,228.00	\$0

**SUMMARY OF TOTALS REQUESTED:**

Total Fees Requested for the Final Fee Period:	\$47,808.00
Total Expenses/Disbursements Requested for the Final Fee Period:	\$0
<b>Total Fees and Expenses/Disbursements Requested:</b>	<b>\$47,808.00</b>

<b>NAME OF PROFESSIONAL &amp; TITLE</b>	<b>RATE</b>	<b>FINAL FEE PERIOD HOURS (June 1, 2023 - July 31, 2023)</b>	<b>FINAL FEE PERIOD FEES (June 1, 2023 - July 31, 2023)</b>
Hal Singer, Managing Director	\$950/hr	8.6	\$8,170.00
Chris Sojourner, Economist	\$560/hr	26.1	\$14,616.00
Augustus Urschel, Economist	\$560/hr	2	\$1,120.00
Jacob Linger, Analyst	\$340/hr	70.3	\$23,902.00
<b>TOTALS</b>		<b>107</b>	<b>\$47,808.00</b>

**SECTION II  
SUMMARY OF SERVICES**

<b>SERVICES RENDERED</b>	<b>PRIOR MONTHLY HOURS (June 1, 2023 - July 31, 2023)</b>	<b>PRIOR MONTHLY FEES (June 1, 2023 – July 31, 2023)</b>
Meetings /Conference Calls	19.3	\$11,949.00
Review Materials	19.5	\$11,351.00
Data Analysis	68.2	\$24,508.00
<b>SERVICE TOTALS:</b>	<b>107</b>	<b>\$47,808.00</b>

I certify under penalty of perjury that the foregoing is true correct.

Executed: August 30, 2023

EconONE Research, Inc.

By: *s/ Lisa Skylar*

Lisa Skylar

Mark Falk  
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Representative for Future Talc Claimants*

**IN THE UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23- 12825

Honorable Michael B. Kaplan

**FINAL APPLICATION OF ECONONE RESEARCH, INC. FOR THE PERIOD  
JUNE 1, 2023 THROUGH JULY 31, 2023**

EconONE Research, Inc. (“Econ One”) submits this Final Application for services rendered and reimbursement of expenses incurred as expert consultant to the FCR (the “Application”) for the period commencing June 1, 2023 and ending July 31, 2023 (the “Application Period”), pursuant to the *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals* [Dkt. No. 562] (the “Interim Compensation Order”), and the *Order (I) Dismissing Debtor’s Chapter 11 Petition pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures with Respect to Requests for Compensation; and (III) Granting Related Relief* [Dkt. No. 1211] (the “Dismissal Order”). By this Application Econ One seeks allowance and payment of compensation in the amount of \$47,808.00 for services rendered by Econ One during the period from June 1, 2023 through July 31, 2023 (the “Final Fee Period”). In support of the Application, Econ One respectfully represents as follows:

## **BACKGROUND**

1. On April 4, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), commencing the above-captioned chapter 11 case (the “Chapter 11 Case”) in the United States Bankruptcy Court for the District of New Jersey.

2. On May 18, 2023 this Court filed the Order Appointing Randi S. Ellis as Legal Representative for Future Talc Claimants (the “FCR Appointment”) [Dkt. No. 551].

3. Following the FCR Appointment, Randi S. Ellis (the “FCR”) selected EconONE Research, Inc. (“Econ One”) to provide economic expert consulting services and analysis of talc claim liability for the FCR. Randi S. Ellis has also selected Walsh Pizzi O’Reilly Falanga LLP to serve as counsel (“FCR Counsel” or “Walsh”).

4. On June 26, 2023, the FCR filed the Application for the Retention of Econ One [Docket No. 892] (the “Retention Application”). On July 13, 2023, this Court entered an order, authorizing the retention of Econ One effective as of June 23, 2023 [Dkt. No. 1024] (the “Retention Order”), attached hereto as **Exhibit A**.

5. Pursuant to the Interim Compensation Order, professionals, as directed therein, shall file with the Court and serve monthly fee statements no later than 30 days after the end of the month for which the fees are sought. If there are no objections to a monthly fee statement, then the professionals are entitled to payment in the amount of eighty percent (80%) of the fees and one hundred percent (100%) of the expenses requested in the monthly fee statement.

6. In accordance with the procedures prescribed in the Interim Compensation Order, Econ One has filed and served monthly fee statements (the “Monthly Fee Statements”) during the

Monthly Fee Period. Copies of the Econ One Monthly Fee Statements are attached hereto as **Exhibit B.**

7. Specifically, on July 31, 2023, Econ One filed and served its first monthly fee statement (the “First Monthly Fee Statement”) requesting payment of fees in the amount of \$3,228.00 (\$4,035.00 less 20% holdback of \$807.00) and reimbursement of expenses in the amount of \$0 incurred for the period of June 1, 2023 through June 30, 2023 (ECF No. 1133; 1134). No objections were filed to the First Monthly Fee Statement and the corresponding Certificate of No Objection was filed on August 15, 2023. (ECF No. 1233).

8. On August 16, 2023, Econ One filed and served its second monthly fee statement (the “Second Monthly Fee Statement”) requesting payment of fees in the amount of \$35,018.40 (\$43,773.00 less 20% holdback of \$8,754.60) and reimbursement of expenses in the amount of \$0 incurred for the period of July 1, 2023 through July 31, 2023 (ECF No. 1238; 1239). The deadline to object to the Third Monthly fee Statement is August 30, 2023.

9. With each of the above referenced Monthly Fee Statements Econ One submitted as an exhibit its monthly billing invoice that detailed the services performed on behalf of the FCR. *See* **Exhibit B.**

10. For the above referenced Monthly Fee Statements, as of the date of this Application, Econ One has received payment for fees in the amount of \$3,228.00 and payment for expenses in the amount of \$0.

11. A summary of the Econ One Monthly Fee Statements is reflected below:

<b>Date Filed</b>	<b>Fees</b>	<b>Less 20% Holdback</b>	<b>Monthly Fee Payment Received</b>	<b>Expense Reimbursement (100%)</b>
July 31, 2023 (June Invoice)	\$4,035.00	\$807.00	\$3,228.00	\$0
August 16, 2022 (July Invoice) (pending)	\$43,773.00	\$8,754.60	\$0	\$0
	<b>Total Fees: \$47,808.00</b>	<b>Total Holdback: \$9,561.60</b>	<b>Total Monthly Fee Payments Received: \$3,228.00</b>	<b>Total Expenses: \$0</b>

12. In accordance with the Interim Compensation Order and the Dismissal Order, Econ One seeks: allowance and payment of compensation in the amount of \$47,808.00 for services rendered by Econ One during the period from June 1, 2023 through July 31, 2023, as well as expenses in the amount of \$0 incurred by Econ One.

**SUMMARY OF SERVICES RENDERED AND EXPENSES INCURRED  
DURING THE FINAL FEE PERIOD**

13. As set forth in the Application cover sheet submitted herewith, Econ One rendered a total of 107 hours of professional services during the Application Period, for which it seeks compensation of \$47,808.00, and incurred \$0 in out-of-pocket expenses which were actual, necessary expenses in connection with rendering the professional services described herein.

14. During the Application Period, Econ One provided economic research and consulting services to the FCR and her professionals including preliminary review and analysis of the Debtor's talc claim liabilities. Econ One professionals analyzed various data and other sources of information and materials to prepare an economic analysis and model for forecasting possible future talc claims. Econ One professionals also engaged and participated in meetings with the FCR and her professionals to discuss case issues and preliminary review of materials and data.

15. In sum, during the Application Period, Econ One provided significant professional services to the FCR solely in connection with this Chapter 11 Case and on behalf of the FCR in

accordance with Econ One's professional responsibilities and the terms of the Order Authorizing Retention of Econ One. Econ One respectfully submits that the services performed were necessary to the administration of this Chapter 11 Case and were beneficial when the services were rendered. All services were performed within a reasonable amount of time commensurate with the complexity, importance and nature of the problem, issue or task addressed.

16. Econ One submits that the compensation sought herein is reasonable within the meaning of sections 330 and 331 of the Bankruptcy Code. Econ One respectfully submits that it rendered all the professional services for which compensation is requested in connection with the Debtor's Chapter 11 case in furtherance of Econ One's professional responsibilities as experts for the FCR and that all such professional services rendered were reasonable and necessary.

17. The FCR was provided with copies of the instant Application and the FCR has since reviewed and approved same for filing.

18. Econ One, by experience, training and ability, was fully qualified to perform the services for which compensation is presently sought. Econ One represents or holds no undisclosed interest adverse to the Estate with respect to the matters upon which it is engaged.

19. No agreement or understanding exists between Econ One and any other entity for the sharing of compensation to be received for services rendered in or in connection with this chapter 11 case.

#### **RELIEF REQUESTED AND CONCLUSION**

WHEREFORE, for all of the foregoing reasons, pursuant to sections 328, 330, and 331 of the Bankruptcy Code, Econ One respectfully requests (i) allowance of compensation for professional services rendered as counsel to the FCR during the Application Period in the amount of \$47,808.00; (ii) reimbursement of actual and necessary expenses incurred by Econ One during



the Application Period in the amount of \$0; and (iii) payment of the total outstanding fees and expenses due to Econ One for the Application Period in the amount of \$44,580.00; and (iv) such other and further relief as this Court deems just and proper.

Executed: August 30, 2023

EconONE Research, Inc.

By: *s/ Lisa Skylar*

Lisa Skylar